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7
8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12 v.
13 TURNER ET AL,
14 Defendant.

Case No. 2:22-cr-00164-JAD-BNW

**STIPULATION TO CONTINUE
PRETRIAL MOTION DEADLINES**
(Fourth Request)

15
16 IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson,
17 United States Attorney, and Randolph J. St. Clair, Assistant United States Attorney, counsel for
18 the United States of America, and Rene L. Valladares, Federal Public Defender, and Joanne L.
19 Diamond, Assistant Federal Public Defender, counsel for Charlene Denise Turner, and Mace J.
20 Yampolsky, counsel for Antoine Gardner that the pretrial motion deadlines currently due on
21 July 12, 2023, be vacated and continued to June 17, 2024.

22 The Stipulation is entered into for the following reasons:

- 23 1. The parties recently filed a stipulation to continue the trial in this matter to July
24 30, 2024, ECF No. 57, which the Court granted, ECF No. 58.
25 2. The parties neglected to include the pretrial motions deadline in the stipulation.
26 The pretrial motions deadline was set for July 12, 2023. ECF No. 46.

1 3. As such, the parties are requesting that the pretrial motions deadline be reset to
2 the June 17, 2024.

3 4. The defendants are out of custody and do not object to the continuance.

4 5. The parties agree to the continuance.

5 6. The additional time requested is not sought for purposes of delay, but to allow
6 all counsel sufficient opportunity to effectively investigate and litigate pretrial motions in this
7 case.

8 This is the third stipulation to continue pretrial motions filed herein.

9 DATED: January 9, 2024.

10 RENE L. VALLADARES
11 Federal Public Defender

JASON M. FRIERSON
United States Attorney

12 /s/ Joanne L. Diamond
13 By _____

/s/ Randolph J. St. Clair
By _____

14 JOANNE L. DIAMOND
Assistant Federal Public Defender

RANDOLPH J. ST. CLAIR
Assistant United States Attorney

15 /s/ Mace J. Yampolsky
16 By _____

17 MACE J. YAMPOLSKY
Counsel for Antoine Gardner

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TURNER ET AL,

Defendant.

Case No. 2:22-cr-00164-JAD-BNW

**FINDINGS OF FACT, CONCLUSIONS
OF LAW AND ORDER**

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The parties recently filed a stipulation to continue the trial in this matter to July 30, 2024, ECF No. 57, which the Court granted, ECF No. 58.

2. The parties neglected to include the pretrial motions deadline in the stipulation. The pretrial motions deadline was set for July 12, 2023. ECF No. 46.

3. As such, the parties are requesting that the pretrial motions deadline be reset to the June 17, 2024.

4. The defendants are out of custody and do not object to the continuance.

5. The parties agree to the continuance.

6. The additional time requested is not sought for purposes of delay, but to allow all counsel sufficient opportunity to effectively investigate and litigate pretrial motions in this case.

ORDER

IT IS THEREFORE ORDERED that the parties herein shall have to and including June 17, 2024 to file any and all pretrial motions and notice of defense.

IT IS FURTHER ORDERED that the parties shall have to and including July 1, 2024 to file any and all responses.

IT IS FURTHER ORDERED that the parties shall have to and including July 8, 2024 to file any and all replies.

DATED this 10th day of January, 2024.


UNITED STATES DISTRICT JUDGE